

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: C.R. BARD, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL NO. 2187
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IN RE: AMERICAN MEDICAL SYSTEMS, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL NO. 2325
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IN RE: BOSTON SCIENTIFIC, PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL NO. 2326
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IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL NO. 2327
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IN RE: COLOPLAST PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL NO. 2387
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IN RE: COOK MEDICAL, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL NO. 2440
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IN RE: NEOMEDIC PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL NO. 2511
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**THIS DOCUMENT RELATES TO ALL CASES**

**ANDERSON LAW OFFICE'S RESPONSE TO MOTION TO EXCEED PAGE LIMIT**

Anderson Law Offices ("ALO") submits this response to Doc. #:223, 2410, 7174, 7302, 7753, 7943 Motion to Exceed Page Limit for Common Benefit Fee and Cost Committee's Omnibus Response to the Objections to the Recommended Allocations of the External Review Specialist dated April 1, 2019. ALO does not oppose this request by the Fee and Cost Committee (FCC), provided that each of the objecting firms are afforded a period of ten days to submit replies of 20 pages or less. Such final responses are critical, as the 75-page "Omnibus Response" is expected to furnish the FCC's first meaningful explanation for a number of questionable legal positions that have been asserted in an effort to justify the award of two-thirds of the common benefit fund to the eight firms that are FCC members. For example, no legally recognized privileges have been identified by the FCC thus far actually allowing the underlying time and expenses entries to be concealed from the non-member firms. And no intelligible explanation has been offered to date for why the FCC members are entitled to an average hourly rate of \$738.02 while firms like ALO that were at the forefront of the TVM litigation are receiving only a third of this stunning figure. The Reply will thus represent ALO's only opportunity to address the FCC's new rationalizations in writing, which will require at least twenty pages of analysis to fully and fairly accomplish.

**CONCLUSION**

In the interest of fairness and justice, this Court should grant the FCC leave to submit a 75-page Omnibus Response only if ALO is afforded a period of at least ten days to file a Reply of 20 pages or less.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 2, 2019, the foregoing **Motion** was filed electronically. Notice of this filing will be sent to all parties by operation of the court's electronic filing system. Parties may access this filing through the court's system.

*s/Paul W. Flowers*

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